

# KING & SPALDING

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May 23, 2023

## VIA ECF FILING

The Honorable Judge Lorna G. Schofield  
U.S. District Court for the Southern District of New York  
Thurgood Marshall  
United States Courthouse  
40 Foley Square  
New York, NY 10007

Re: Hiring of Michael Taintor – Notice under Rule 1.12, New York Rule of Professional Conduct

*In re Foreign Exchange Benchmark Rates Antitrust Litigation, No. 1:13-cv-07789*

Dear Judge Schofield,

I write on behalf of King & Spalding LLP (“King & Spalding”) and Michael Taintor to inform the Court that Mr. Taintor, who previously served as a law clerk with the U.S. District Court for the Southern District of New York from March 2022 through March 2023, is expected to begin as an associate at King & Spalding starting on May 30, 2023.

Mr. Taintor has advised that, due to his service as a law clerk, he is conflicted from the above-referenced matter. King & Spalding represents Deutsche Bank AG in connection with the same matter. Under Rule 1.12 of the New York Rules of Professional Conduct, Mr. Taintor is personally disqualified from representing anyone in connection with a matter in which he participated personally and substantially during his tenure as law clerk. To prevent imputed disqualification of other King & Spalding attorneys, Mr. Taintor will be screened starting on his first day at the firm from any participation in the matter and apportioned no part of the fees therefrom. This letter is submitted to provide written notice that King & Spalding and Mr. Taintor are in compliance with Rule 1.12 of the New York Rules of Professional Conduct. King

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& Spalding will continue to represent its client and it may properly do so under Rule 1.12(d) because:

1. King & Spalding and Mr. Taintor have agreed that he will be timely screened from any form of participation in the above-referenced matter, and he will not be apportioned fees therefrom.
2. The procedures being taken to screen Mr. Taintor from the matter are: (i) a prohibition against his speaking about the matter with or in the presence of any King & Spalding personnel; (ii) a prohibition against any of the King & Spalding personnel working on the matter from speaking about it in the presence of Mr. Taintor; (iii) a prohibition against Mr. Taintor from bringing to King & Spalding any documents, files, or materials in any form or medium about the matter; and (iv) a prohibition against Mr. Taintor accessing, reading, or reviewing any documents, files, or materials in any form or medium about the matter. King & Spalding will distribute to all personnel who are working on or in the future are added to the matter a written notification setting forth these prohibitions and their obligation to abide by them strictly.

By copy of this letter, I am notifying all parties to the matter of this ethical screen in compliance with Rule 1.12.

Very truly yours,

*/s/ Patrick Montgomery*

Patrick Montgomery

cc: All Counsel Via ECF Filing